

Mr. Tom Montoya, Supervisor
Wallowa-Whitman National Forest
1550 Dewey Ave. #A
Baker City, OR 97814

Re: Lostine Corridor Project

March 21, 2017

Dear Supervisor Montoya:

Based on applicable law and review of the public involvement process for the Lostine Corridor Public Safety Project ("the Project"), I respectfully suggest a full NEPA process, as opposed to a Categorical Exclusion (CE), for this Proposed Action is required.

Title 1, Section 104(f) of the 2014 Farm Bill states: "...the Secretary [of agriculture] shall facilitate collaboration among state and local governments and Indian tribes, and participation of interested persons, during the *preparation* (emphasis added) of each authorized fuel reduction project..."

Title VI, Section 603(b)(1)(C) of the Farm Bill requires that fuels reduction projects must be: "*Developed* (emphasis added) and implemented through a collaborative process that (i) includes multiple interested persons representing diverse interests; and (ii) is transparent and nonexclusive."

Based on review of the Project record as shown on the Wallowa-Whitman National Forest web site, the Lostine Project does not meet the requirements of the Farm Bill provision for a CE. Its preparation and development was not via any Forest Service-sponsored collaborative process among the various stakeholders and constituencies. Publics were never brought together in a single meeting, either through an established collaborative or by any invitation from the WWNF. Nor was any viable opportunity provided to influence the Project prior to development of a Proposed Action.

The Scoping Notice dated February 2, 2016 indicates pre-determination of a specific plan of action prior to any public meetings or tours. It refers to an established "project," and outlines a four-point strategy including: "...removal of hazard trees...(logging for) creation of defensible space...(logging to) increase canopy spacing...(and logging to) decrease the risk of potential high-intensity fires."

In an April 20, 2016 press release, acting Wallowa District Ranger Jake Lubera states: "I was happy to hear that the public considers the Lostine Corridor Public Safety Project an important project being undertaken by the Forest Service." He goes on to state he will: "...further coordinate with the public...in completing the Environmental Analysis by Fall of 2016." Mr. Lubera references an established "project," and also indicates that an Environmental Analysis will be prepared. I am not aware of any notice informing the public that the plan to prepare an EA was changed in favor of doing only a CE.

Further, in the Project section titled "Collaboration," dated February 21, 2017, the only meetings listed prior to release of the Scoping Notice were not open to the public. They were with state and federal agencies, the Wallowa County NRAC, Wallowa Resources, the Nez Perce Tribe and landowners. The only contact made to forest advocacy, angling or hunting groups were via telephone only 17 days prior to the release of the Scoping Notice and the Proposed Action.

Based on the Project record, the Forest Service did not “facilitate collaboration” to develop the Project. Publics were not brought together for the free exchange of ideas to address the fuel-loading situation in the Lostine Corridor. The only opportunity was to individually attempt to influence an already-detailed plan of action.

This situation cannot be mitigated by initiating a collaborative process after the fact. It would not undo the existing Proposed Action. Therefore the conditions of the Farm Bill allowing CE's can no longer be met for the Lostine Project.

There exist a wide variety of alternative actions that could be considered if public interest groups were given an opportunity for meaningful involvement that began from scratch via a full NEPA process. Some options would include: alternative mechanical fuels reduction scenarios, prescribed burning, managed firewood cutting, a site-specific evacuation plan, and area closures.

The Forest Service has provided no evidence the situation in the Lostine Corridor is so dire that action to address the situation must be expedited. You are considering the fate of the Lostine River Corridor, a place that is cherished by people locally and from across the nation. It, and they, deserve better than a rushed process with little or no transparency, nor ownership beyond the Forest Service.

I urge you to fulfill the requirements of NEPA by preparing a full EA to determine whether “significant impacts” would occur, and to identify extraordinary circumstances, and thus determine whether an Environmental Impact Statement must be prepared.

Thank you for your consideration, I look forward to your prompt response.

Sincerely,

Richard K. Bailey
P.O. Box 1086
Winthrop, WA 98862

CC- Kris Stein, Wallowa District Ranger
Honorable Senator Ron Wyden
Jennifer Schemm, Hells Canyon Preservation Council